

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

NATHAN DAVID HANKINS,

Defendant.

5:19 - MW - 143

AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT

State of South Dakota    )  
  ) ss  
County of Pennington    )

INTRODUCTION AND AGENT BACKGROUND

I, Elliott Harding, Detective with the Rapid City Police Department and currently assigned to the South Dakota Internet Crimes Against Children Taskforce (ICAC), being duly sworn, states as follows:

1. I have been a law enforcement officer since December 1st of 2008. I have received training at the Law Enforcement Training Academy in Pierre, SD, training as a new police officer recruit along with various Police Training Officers and my own experience working in the Patrol Division. I have worked as a Detective in the Criminal Investigations Department beginning April of 2014 and primarily focused on stolen vehicles, pursuits and other general property crimes. During that time, I attended the Reid Technique of Interview and Interrogations. I have worked as a Detective in the Internet Crimes Against Children (ICAC) Task Force since August of 2015. During this time, I have

attended classes in regards to on-line ads and undercover chat investigations as it pertains to child exploitation as well as prostitution/human trafficking. I have also attended classes in regards to the BitTorrent Network as it pertains to the download and sharing of child pornography files. As a Special Assistant Attorney General with State of South Dakota my duties include investigations related to illegal possession and distribution of images containing sexually explicit material, and investigations dealing with illegal activities concerning the Internet or World Wide Web.

2. During my law enforcement career, I have become familiar with the *modus operandi* of persons involved in the receipt of child pornography in violation of federal law. Based on my experience and training, I am knowledgeable of the various means utilized by individuals who illegally receive illicit images of children.

3. The information set forth below is based upon my knowledge of an investigation conducted by the South Dakota Internet Crimes Against Children Taskforce (ICAC) and the investigation of other law enforcement agents and officers including, but not limited to, South Dakota Division of Criminal Investigation (DCI) and Homeland Security Investigations (HSI). I have not included every fact obtained pursuant to this investigation, but have set forth those facts that I believe are essential to establish the necessary probable cause for the criminal complaint. I have not omitted any material fact relevant to the

consideration of probable cause for a criminal complaint against the above named defendant.

4. I have been informed that 18 U.S.C. § 2252A makes it a crime to receive, distribute and possess child pornography.

5. Your affiant respectfully submits that there is probable cause to believe that Nathan David Hankins committed the crime of receipt of child pornography.

6. On 10/23/19, I received CyberTip 55543766 from the National Center for Missing and Exploited Children (NCMEC). A copy of the CyberTip was copied to compact disc and stored in the ICAC lab. Google had reported to NCMEC the following:

- Incident Type: Child Pornography (possession, manufacture, and distribution); Incident Time: 09-16-2019 18:15:05 UTC  
Description of Incident Time: The incident date refers to the approximate date and time Google became aware of the reported material.
- Name: Nathan Hankins  
Mobile Phone: +16058584349 (Verified 01-14-2019 10:21:13 UTC)  
Email Address: nathan.hankins101@gmail.com (Verified)
- The CyberTip provided multiple Login IP addresses within this portion and are mentioned below.
- Google became aware of the reported content which was stored in Google Photos infrastructure

- Number of uploaded files: 35
- 605-858-4349= Cellco Partnership, LLP DBA Verizon Wireless.  
(Verified by Google on 01-14-2019 10:21:13 UTC)
- The following IP addresses are Google account "Login" IP's provided in the Cybertip:
  - **AT&T**
    - 2600:387:b:f::b1  
09-03-2019 18:33:27 UTC
  - **Hughes Network System**
    - 67.142.203.141  
07-30-2019 23:54:53 UTC
      - *Linette Haskin of Hughes Network Systems informed me via email IP address 67.142.203.141 came back to Denny's restaurant for Guest Wi-Fi service.*
  - **Verizon**
    - All IPv6 addresses starting with 2600:1014... belong to Verizon.
  - **Midco**
    - All IPv6 addresses starting with 2100:48f8... belong to Midco.
      - 64.33.98.53
      - 216.71.19.57

- The following IP addresses are "Upload" IP's used to upload the child pornography pictures and videos. The IP's were provided in the CT.

- **Verizon**

- All IPv6 addresses starting with 2600:1014... belong to Verizon.

- **Midco**

- 24.49.125.182

7. The uploads occurred between 8/15/19 13:05:17 UTC and 9/3/19 23:07:45 UTC.

8. I observed 34 images and one video of child pornography. Below is a summary of some of the images/videos:

- **3ug1DCQS.jpg:** This picture showed a child between the ages of 3-5 years of age being orally raped by what appeared to be an adult nude male. I could see the child's nude chest area as well as the male's nude erect penis. I could see a multi colored green pillow in the background.
- **6zx3yljZ.jpg:** This picture showed a child between the ages of 4-6 years of age being vaginally raped by what appeared to be an adult male. I could see the child's nude chest area as well as the child's nude vagina. I could see the male's nude erect penis. I could see a multi colored bed sheet in the background.
- **63xHmY6C.jpg:** This picture showed a child between the ages of 4-6 years of age being vaginally raped by what appeared to be an adult male. I could see the child's nude chest area as well as the child's nude vagina. I could see the male's nude erect penis. I could see a multi

colored bed sheet in the background. I could also see two female children in the background who were not nude.

- **144415177\_KmhTXYST.jpg:** This picture showed two female children between the ages of 3-5 years of age. One child had a nude erect penis against her lips while the other child was sucking on the male's testicles.
- **144415192\_vizVGACY.jpg:** This picture showed two female children between the ages of 4-7 years of age. One child was being orally raped by a nude erect penis while the other child was kissing the male. It appeared as if the picture was taken inside a van.
- **OjpBEYrA.jpg:** This picture showed a male ejaculating his nude erect penis into the mouth of a 3-5 year old female child. The nude erect penis was touching the child's lips.
- **Google-CT-RPT-d7e0a4d91105c478cedc9def17cc36d7:** This video is 12 seconds in length. The video showed a female child between the 8-12 years of age. The child was sitting on a bathroom floor. The child was masturbating her nude vagina and anus with a tooth brush.

9. It should be noted some images were duplicate images.

10. Local police records showed a Nathan Hankins (xx/xx/92) in the system. I am aware that Hankins is a registered sex offender based on a conviction for statutory rape in Pennington County. Records showed Nathan's address (address redacted), Rapid City, SD 57703 (not the SUBJECT PREMISES).

11. On 10/23/19, I also received CyberTip 55632509. This CyberTip contained one image of child erotica. The CyberTip provided the same Suspect information to include name, phone number and email address. The CyberTip also provided the same Google Login IP addresses as above. The only new information provided was the Upload IP address as well as date and time of the single image of child erotica. Below is the new information:

- 24.49.125.182
- 08-19-2019 23:23:48 UTC

12. According to the CyberTip, per Google, multiple IP addresses were used to login to the nathanhankins101@gmail.com account as well as upload the images of child pornography to the nathanhankins101@gmail.com account. On 10/23/19, I emailed Linette Haskin of Hughes Network System regarding the IP address corresponding to Hughes Network System. Ms. Haskin replied the same day stating the IP address came back to Denny's restaurant for Guest Wi-Fi service.

13. On 10/30/19, I sent a federal subpoena to AT&T regarding IP addresses corresponding to AT&T. AT&T replied that they do not maintain records in the normal course of business that associate individual accounts or devices with wireless dynamic IP addresses.

14. The suspect phone number provided in the CyberTip, 605-858-4349, came back to provider Cellco Partnership, LLP DBA Verizon Wireless. On 10/30/19, I sent a federal subpoena to Verizon regarding the IP addresses

corresponding to Verizon. As of 11/15/19, Verizon has not returned subscriber information.

15. On 10/30/19, I sent a federal subpoena to Midco regarding the IP addresses corresponding to Midco.

- **IP address: 24.49.125.182**

- Name: Avanti Hotel
- Address: 102 N. Maple Ave, Rapid City, SD 57701
- It should be noted that local police records showed in address history that Nathan Hankins had an address of 102 N. Maple Ave, Rapid City, SD 57701.
- On 10/10/19, law enforcement observed Nathan Hankins come out of room #30 of the Avanti Hotel and proceeded to make contact with him, PCR19-214696.
- \* The majority of the child pornography uploads occurred from IP address 24.49.125.182 \*

- **IP addresses: 2001:48F8:1002:7B7... and 64.33.98.53**

- Name: Kali Njos
- Address: 5040 Red Rock Canyon Rd., Rapid City, SD 57702
- SSN: Ending in 3588
- Phone: 605-791-0383
- During my investigation, I learned Kali Njos and Nathan Hankins have a child together, CR18-205892.

- **IP address: 216.71.19.57**

- Name: Little Caesars Pizza
- Address: 685 N. Lacrosse St., Rapid City, SD 57701
- Per police record 18-205892, RCPD Detective Ryan Gebhard made contact with Kali Njos during an unrelated investigation on 6/13/19. In doing so, Detective Gebhard learned Nathan worked at Little Caesars Pizza on N. Lacrosse St.
- During the course of Detective Gebhard's investigation, he made contact with Nathan at Little Caesars Pizza on 6/13/18.
- Recently, via email, Detective Gebhard informed me he had observed Nathan's vehicle at the Little Caesars Pizza around the months of September and October 2019.

16. Local police records showed a Nathan Hankins (xx/xx/92) in the system with an address of (address redacted), Rapid City, SD 57703 (not the



SUBJECT PREMISES). On 10/31/19, Detective Gebhard informed me that Nathan drove a 2016 silver Nissan Maxima, SD Lic #: 49EW73.

17. On 11/4/19, I sent a federal search warrant to Google via their law enforcement portal, case #: 3089328. On 11/12/19, I received return search warrant information from Google. Below is a summary of the information contained within:

- I observed additional images of child pornography as well as the images provided in the original CyberTip within the Google search warrant return.
- I also observed a picture of who I believe to be Nathan Hankins after comparing the male to police booking photos of Nathan Hankins. The picture showed Nathan sitting on play equipment at what appeared to be a park. A girl, approximately 2-3 years old, sat on Nathan's lap. Nathan wore a red shirt and glasses. There was sand surrounding the play area and play equipment. The play equipment was red in color and I believe it to be some type of digging equipment. The Exif data showed the picture was generated with a Motorola Moto g(6) on 6/17/19. The picture was titled IMG\_20190617\_192226021.jpg.
- Upon reviewing the email contained within, I observed the following emails which may be significant to this case:

7/30/19 - Email sent from Nathan regarding a rental application.

- Within the rental application, it showed the following information for Nathan Hankins:
  - Nathan Hankins
  - 10/12/92
  - 437-85-6685
  - 01203722
  - 102 N. Maple Ave.
  - 605-858-4349 - which matches the number listed in the information provided in the Cybertip
  - nathan.hankins101@gmail.com - which matches the information provided in the Cybertip

9/1/19 - Email sent to Nathan regarding a Netflix payment paid with VISA ending in 9945.

9/4/19 - Email sent to Nathan regarding a Verizon payment paid with bank account ending in 7002.

9/10/19 - Email notification that Dropbox was granted access to Google account nathan.hankins101@gmail.com

9/12/19 - Email located in the nathan.hankins101@gmail.com from nathan.hankins101@gmail.com. Within the body of the email was the following link:

[https://mega.nz/#F!d11W1CjT!OO5zTB!vM4CEnzumX\\_AWCA](https://mega.nz/#F!d11W1CjT!OO5zTB!vM4CEnzumX_AWCA) **(WARNING: LINK TAKES YOU TO CHILD PORNOGRAPHY!).**

18. I did a Google search of mega.nz and learned the following: MEGA is a cloud storage and file hosting service offered by Mega Limited, an Auckland-based company. The service is offered primarily through web-based apps. On 11/12/19, I clicked on the web address mentioned above and was sent to a web page with what he observed to be multiple thumbnails of child pornography. The thumbnails appeared to be representations of child pornography videos. The folder containing the videos was titled Dark5. Within the Dark5 main folder was a sub folder titled New folder. Within this sub folder was an audio file titled, "Nirvana - Scentless Apprentice Lyrics.mp3." The website showed "1/101 items are selected, with a total size of 1.20 GB." I took screen shots of the video thumbnails observed on this first page. Not knowing if what I was observing was only thumbnail pictures of videos or actual links to the child pornography videos, I clicked on the first video thumbnail and observed a video showing a 4-6 year old female child being vaginally raped and then ejaculated upon. In an effort to preserve evidence, I clicked the "Download as ZIP" option located in the upper right hand corner of the screen. The .zip file downloaded to his ICAC computer. The .zip file was automatically titled

Dark5.zip. The Dark5.zip file downloaded with the following message, "Not all of the files could be downloaded as a ZIP file. This can happen if some of the files were taken down. The operation finished with 98 of 101 items downloaded successfully."

19. I extracted the file Dark5.zip to confirm the content downloaded was in fact what I had originally observed on the website mail page. The videos appeared to be the same as what I had initially observed, but a few of the videos did not appear to download successfully. I was unable to determine why these few videos did not download properly. These files were titled:

- 002 (2).3gp
- 7yo-Gina-flip.mkv
- CHD Mickey Mouse Sheets Girl. 11 yo Chinese girl in Yellow bikini lets Dad play 14.48.mkv

20. On December 4, 2019, at approximately 6:30a.m., law enforcement executed a federal search warrant on Hankins' Rapid City residence. Upon entry, law enforcement observed Hankins, nude and also observed his seventeen year old girlfriend to be nude under covers. Agents searched Hankins' apartment and seized multiple devices from both Hankins and his girlfriend, including Hankins' cell phone.

21. Hankins is currently charged with a state sex offense regarding his girlfriend.

22. After the search warrant, Hankins was arrested on state charges for contributing to the delinquency of a minor, possession of marijuana, possession

of drug paraphernalia and two counts of violation of a no contact order, which was in place prohibiting him from contacting his minor girlfriend.

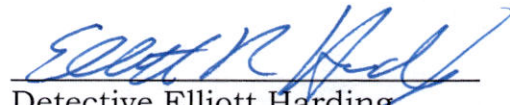
23. Upon forensic examination of Hankins' cell phone, examiner Hollie Strand located approximately 175 pictures and 4 videos of child pornography. The images appear to have been downloaded or obtained through a Cloud-based internet application or transferred to the phone via the internet. Some of the images were in a folder called "UFOTO," a "selfie" app which utilizes the internet, while others were Thumbnails meaning the images were accessed via that device.

CONCLUSION

24. I submit that there is probable cause to believe that Nathan David Hankins committed a violations of 18 U.S.C. § 2252A, receipt of child pornography.

Wherefore, I request the issuance of a criminal complaint and warrant for the arrest of Nathan David Hankins.

Dated: 12/4/19

  
Detective Elliott Harding  
Pennington County Sheriff's Office  
and ICAC

SUBSCRIBED and SWORN to

she in my presence  
\_\_\_\_\_ by reliable electronic means

this 4<sup>th</sup> day of December, 2019.

  
DANETA WOLLMANN  
U.S. MAGISTRATE JUDGE